

SECOND JUDICIAL DISTRICT COURT
STATE OF NEW MEXICO
COUNTY OF BERNALILLO
Case No. D-0101-CV-2012-

KG

~~D-202-CV-2012-01783~~

Ruben Archibeque,

Plaintiff,

vs.

Jeffrey Yukawa, Textura Corporation and
Chubb Group of Insurance Companies,

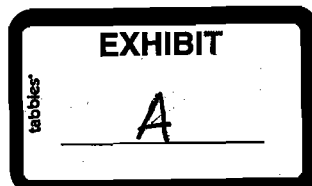
Defendants.

COMPLAINT TO RECOVER DAMAGES FOR PERSONAL INJURIES

PLAINTIFF, Ruben Archibeque, by and through his undersigned attorneys,
O'FRIEL and LEVY, P.C., by Lee R. Hunt, Esquire, for his Complaint to Recover
Damages for Personal Injuries, hereby comes forth and states as follows:

GENERAL ALLEGATIONS

1. Plaintiff Ruben Archibeque is a resident of the State of New Mexico, County of Valencia.
2. Defendant, Chubb Group of Insurance Companies, is an insurance company that does business in the State of New Mexico, and provided insurance to Defendant Jeffrey Yukawa and Textura Corporation, and is a proper party here pursuant to *Raskob v. Sanchez*, 1998-NMSC-045, 126 N.M. 394."
3. Defendant, Jeffrey Yukawa, on information and belief, is a resident of the State



of California and driver of the vehicle that caused a crash on April 10, 2009.

4. Defendant Textura Corporation was Jeffrey Yukawa's employer at the time of the crash and Mr. Yukawa was conducting Textura business at the time of the crash.

5. All of the events set forth herein transpired in the County of Bernalillo, State of New Mexico.

6. Jurisdiction and venue are proper in this Court.

7. On or about April 10, 2009, Plaintiff Ruben Archibeque was a passenger in a vehicle driven by John Leatherman. Mr. Leatherman was safely operating his motor vehicle and proceeded toward the intersection of Gibson and Yale. Mr. Leatherman continued east on Gibson when Defendant Jeffrey Yukawa turned into Mr. Leatherman's lane of travel. Mr. Yukawa violently impacted the front left side of Plaintiff's vehicle.

8. As a direct and proximate result of Defendants' negligence, Plaintiff has suffered injuries in the form of medical expenses, physical impairment, severe back injuries, pain and suffering, lost earnings and loss of enjoyment of life and in the future, will incur liability for future medical expenses, future lost earnings, loss of enjoyment of life, physical impairment and pain and suffering, in an amount to be proven at trial.

WHEREFORE, Plaintiff Ruben Archibeque has stated his Complaint against Defendants, Jeffrey Yukawa, Textura Corporation and Chubb Group of Insurance Companies, as aforesaid, and pray for compensatory damages in an amount to be proven at the time of trial, pre-judgment interest, costs, and any other relief the Court deems just and proper.

Respectfully Submitted By:

O'FRIEL and LEVY, P.C.
Attorneys for Plaintiff

By /s/ Lee R. Hunt
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